

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-08292-SHS;
No. 1:23-cv-10211-SHS

**AFFIDAVIT OF REILLY T.
STOLER IN SUPPORT OF
MOTION FOR ADMISSION *PRO
HAC VICE***

I, Reilly T. Stoler, being duly sworn, declare as follows:

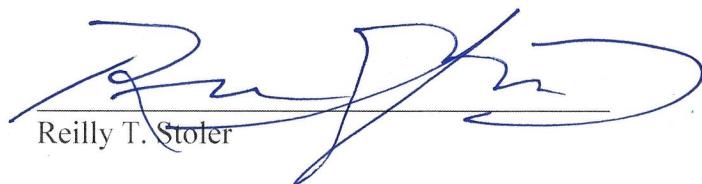
1. I am an attorney licensed to practice law in the state of California. I submit this Affidavit in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York in the above captioned matter.

2. I am a member of good standing in the bar of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto.

3. Pursuant to Local Rule 1.3(c), I state:

- a. I have never been convicted of a felony.
- b. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
- c. There are no disciplinary proceedings presently against me.

I declare under penalty of perjury that the foregoing is true and correct to best of my knowledge and belief.



Reilly T. Stoler

**STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

Subscribed and sworn before me, a notary public duly qualified and acting in the state and county aforesaid, this 21st day of March, 2024.



Lexita Sims
Notary Public

My commission expires:

DECEMBER 19, 2025

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of SAN FRANCISCO)

Subscribed and sworn to (or affirmed) before me on this 21st day
of MARCH, 20 24, by REILLY TODD STOLER

proved to me on the basis of satisfactory evidence to be the person(s)
who appeared before me.



(Seal)

Signature

Optional Information

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this jurat to an unauthorized document and may prove useful to persons relying on the attached document.

Description of Attached Document

This certificate is attached to a document titled/for the purpose of

AFFIDAVIT OF REILLY T. STOLER
IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE

containing 2 pages, and dated MARCH 21, 2024.

Additional Information

Method of Affiant Identification

Proved to me on the basis of satisfactory evidence:
 form(s) of identification credible witness(es)

Notarial event is detailed in notary journal on:

Page # _____ Entry # _____

Notary contact: _____

Other

Affiant(s) Thumbprint(s) Describe: _____